UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

------ X

JANE FREED, : 06 cv 13721 (CLB)(LMS)

ECF Case

Plaintiff,

- against -

MOTION FOR JUDGMENT

ON ADMINISTRATIVE

RECORD

FIRST UNUM LIFE INSURANCE COMPANY,

Defendant.

----- X

PLEASE TAKE NOTICE that, upon the annexed September 13, 2007 Stipulation Submitting Administrative Record, in which the parties jointly request that the Court render judgment on the stipulated Administrative Record; the Stipulated Administrative Record; and all prior papers and proceedings in this action, defendant, First Unum Life Insurance Company, will move this Court, at the Courthouse, 300 Quarropas Street, White Plains, NY, on October 26, 2007 at 10:00 a.m., or as soon thereafter as counsel can be heard, for an order: (a) confirming First Unum's administrative determination; (b) entering judgment in favor of First Unum on the administrative record; and (c) dismissing the complaint. Pursuant to the Court's September 13, 2007 Order, plaintiff's opposition papers, if any, must be served on or before October 9, 2007.

Date: Bronxville, New York

September 18, 2007

BEGOS HORGAN & BROWN LLP

By: S/ Patrick W. Begos
Patrick W. Begos (PB4372)
Attorneys for Plaintiffs
7 Pondfield Road
Bronxville, New York 10708
(914) 961-4441

TO: DeHAAN BUSSE, LLP Attorneys for Plaintiff 300 Rabro Drive Hauppauge, NY 11788

UNITED STATES DISTRICT COU	JRT
SOUTHERN DISTRICT OF NEW	YORK

JANE FREED,

06 cv 13721 (CLB)(LMS)

ECF Case

Plaintiff.

- against -

S T I P U L A T I O N S U B M I T T I N G ADMINISTRATIVE RECORD

FIRST UNUM LIFE INSURANCE COMPANY.

Defendant.

IT IS HEREBY STIPULATED AND AGREED, between undersigned counsel for both parties,

that:

 The administrative record in this action shall be limited to the following documents: FULCL 00001 through FULCL 00426; and FULCL-RSA-00001 through FULCL-RSA-00287.

 The parties jointly request that the Court render judgment on the this stipulated administrative record.

Dated:

Bronxville, New York September 13, 2007

BEGOS HORGAN & BROWN LLP

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
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JANE FREED,	:	06 cv 13721 (CLB)(LMS)
	:	ECF Case
Plaintiff,	:	
– against –	:	
	:	
FIRST UNUM LIFE INSURANCE COMPANY,	:	
	:	
Defendant.	:	
	:	
	X	

ADMINISTRATIVE RECORD

Part 1 of 2

FULCL-00001 through FULCL-00426

FILED IN HARD COPY PURSUANT TO SECTION 5 OF THE COURT'S PROCEDURES FOR ELECTRONIC CASE FILING

BEGOS HORGAN & BROWN LLP Attorneys for Defendant 7 Pondfield Road Bronxville, NY 10708 (914) 961-4441

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
	X	
	:	
JANE FREED,	:	06 cv 13721 (CLB)(LMS)
	:	ECF Case
Plaintiff,	:	
– against –	:	
	:	
FIRST UNUM LIFE INSURANCE COMPANY,	:	
	:	
Defendant.	:	
	:	
	X	

ADMINISTRATIVE RECORD

Part 2 of 2

FULCL-RSA-00001 through FULCL-RSA-00287

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BEGOS HORGAN & BROWN LLP Attorneys for Defendant 7 Pondfield Road Bronxville, NY 10708 (914) 961-4441